

From: Vyas, Himanshu

Sent: Wednesday, August 01, 2018 11:22 PM

To: Beeler, Cindy; Mia, Marcia; Topinka, Natalie; Kaleri, Cynthia

Subject: RE: Proposed TVOP 18-00005 Dominion Energy Transmission, Inc. - Finnefrock CS

Actually, I just looked up a few ADIs regarding this issue; **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

Himanshu Vyas

Environmental Engineer

U.S. EPA, Region III

Office of Permits and State Programs (3AP10)

1650 Arch Street

Philadelphia, PA 19103-2029

Phone: 215-814-2112

FAX: 215-814-2134


"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Vyas, Himanshu

Sent: Wednesday, August 01, 2018 6:14 PM

To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>

Subject: FW: Proposed TVOP 18-00005 Dominion Energy Transmission, Inc. - Finnefrock CS

I have an interesting state-level question about fugitive emissions/LDAR. PADEP must implement a RACT for VOC as part of its ozone attainment plans since it is considered in non-attainment. RACT is usually considered a state-level requirement and not a federal requirement; different states target different industries for reductions. 

## Ex. 5 Deliberative Process (DP)

"For natural gas transmission facilities, the fugitive VOC source will be the group of fugitive VOC emitting components associated with an individual source that has a stack emission. For example, an engine, a turbine, or a dehydrator unit would be an individual source and all fugitive VOC emitting components such as flanges, crankcase

vents, compressor seals, seal vents, valves and connectors associated with this engine, turbine or dehydrator unit would be collectively considered as a separate VOC emitting source. Additionally, all pigging operations at the transmission facility would be considered as an individual VOC emitting source.

In the case of natural gas transmission facilities, if the owner or operator demonstrates that VOC emissions from a group of fugitive VOC emitting components associated with an individual source is less than 1 ton per year, then these sources are not subject to RACT requirements, if VOC emissions from the group of fugitive VOC emitting components is less than 2.7 tons per year, then the owner or operator may comply with the presumptive RACT requirements of §129.97(c) (2), and if the VOC emissions from the group of fugitive VOC emitting components is greater than 2.7 tons per year, then VOC RACT requirements will be determined on a case by case basis."

Have you seen anything similar elsewhere?

**Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

If this is better explained over a phone call, I am happy to have a quick call.

Thanks,

Himanshu Vyas

Environmental Engineer

U.S. EPA, Region III

Office of Permits and State Programs (3AP10)

1650 Arch Street

Philadelphia, PA 19103-2029

Phone: 215-814-2112

FAX: 215-814-2134

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Velez-Rosa, Emlyn

Sent: Wednesday, August 01, 2018 9:34 AM

To: Vyas, Himanshu <vyas.himanshu@epa.gov>

Cc: Schulingkamp, Joseph <Schulingkamp.Joseph@epa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>

Subject: FW: Proposed TVOP 18-00005 Dominion Energy Transmission, Inc. - Finnefrock CS

Hi, Himanshu

## **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

Fugitive emissions-For purposes of Chapter 127 (relating to construction, modification, reactivation and operation of sources), those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening.

## **Ex. 5 Deliberative Process (DP)**

Any thoughts? We can talk in person if that's easier.

Thanks!

Emlyn Vélez Rosa

Environmental Engineer

Office of Air Program Planning

Air Protection Division

US Environmental Protection Agency, Region III

1650 Arch Street (3AP30)

Philadelphia, PA 19103

T. 215.814.2038

Emlyn

From: Schulingkamp, Joseph

Sent: Tuesday, July 31, 2018 4:46 PM

To: Velez-Rosa, Emlyn <Velez-Rosa.Emlyn@epa.gov>

Subject: FW: Proposed TVOP 18-00005 Dominion Energy Transmission, Inc. - Finnefrock CS

From: Shimmel, David [mailto:dshimmel@pa.gov]

Sent: Tuesday, July 31, 2018 3:41 PM

To: Bertram, Emily <Bertram.Emily@epa.gov>; Schulingkamp, Joseph  
<Schulingkamp.Joseph@epa.gov>

Cc: Waldman, Paul R <pwaldman@pa.gov>

Subject: RE: Proposed TVOP 18-00005 Dominion Energy Transmission, Inc. - Finnefrock CS

Emily, Joseph:

See attached for the fugitives guidance the Department. Although it is titled pertaining to RACT II it has long term implications for our §123.1 reg regardless of whether the facility is TV or State Only.

Dave

Dave Shimmel, P.E. | Chief, New Source Review Section

Department of Environmental Protection | Air Quality Program

North Central Regional Office

208 West Third Street Suite 101 | Williamsport PA 17701

Phone: 570.327.3568 | Fax: 570.327.3420

www.dep.pa.gov

From: Hackenberg, Martha

Sent: Tuesday, June 26, 2018 9:16 AM

To: Trivedi, Viren <vtrivedi@pa.gov>; Bhatt, Naishadh <nabhhatt@pa.gov>; Wenrich, Sean <sewenrich@pa.gov>; Pascucci, Vincent <vpascucci@pa.gov>; Linn.Emily@epa.gov

Cc: duke, gerallyn <duke.gerallyn@epa.gov>; Shimmel, David <dshimmel@pa.gov>; Zaman, Muhammad <mzaman@pa.gov>; Husted, Daniel <dhusted@pa.gov>; Schulte, Steven <sschulte@pa.gov>; Waldman, Paul R <pwaldman@pa.gov>

Subject: Proposed TVOP 18-00005 Dominion Energy Transmission, Inc. - Finnefrock CS

Attached please find copies of the proposed Title V operating permit 18-00005, review memo, and newspaper notice for Dominion Energy Transmission, Inc. - Finnefrock CS located in Leidy Township, Clinton County, Pennsylvania. Please review the enclosed permit.

If you have any questions or clarifications regarding the proposed permit, please contact Air Quality Engineer Paul Waldman, New Source Review Section, 570-327-3721 or pwaldman@pa.gov .

Martha Hackenberg | Clerk Typist 2

Department of Environmental Protection | Administrative/Clerical

North Central Regional Office

208 West Third Street Suite 101 | Williamsport PA 17701

Phone: 570.327.3638 | Fax: 570.327.3420

www.dep.pa.gov